

STATE OF INDIANA)
COUNTY OF LAKE)

IN THE LAKE SUPERIOR COURT

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CLERK LAKE SUPERIOR COURT

ROBERT PATEL,

PLAINTIFF,

vs.

NORTHLAND GROUP INC.

DEFENDANT.

Cause Number: 45D041106C T00142

COMPLAINT AND DEMAND FOR JURY TRIAL - INDIVIDUAL

Plaintiff, Robert Patel (hereinafter referred to as "Mr. Patel"), on behalf of himself, by counsel, Michael P. McIlree, for his Complaint against the Defendant, Northland Group Inc. ("Northland"), alleges and state the following:

INTRODUCTION

1. This is an action for damages brought by the Plaintiff, ("Mr. Patel"), for the Defendant's violations of the Federal FAIR DEBT COLLECTION PRACTICES ACT, 15 U.S.C. § 1692, *et seq.* (hereinafter referred to as "FDCPA") which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

JURISDICTION

2. This Court has jurisdiction over the claims in this matter as Plaintiff resides in Lake County and the conduct complained of occurred here.



PARTIES

3. Mr. Patel is an individual consumer currently residing in Lake County, Indiana.

4. Northland Group Inc. is a collection agency who collects debts nationwide including the State of Indiana.

5. Northland Group Inc. is a debt collector as defined by 15 U.S.C. § 1692a(6). Defendant regularly collects or attempts to collect, directly or indirectly, debts owed or due or asserted to be owed or due another.

FACTUAL ALLEGATIONS

6. Plaintiff has been receiving phone calls from Defendant regarding an alleged debt to Citibank obtained for personal, family, or household purposes.

7. Defendant had phone communication with Plaintiff on June 8, 2011.

8. Plaintiff provided a letter to Defendant pursuant to 15 USC 1692c on June 8, 2011.

9. Nonetheless, the phone calls from Defendant have not ceased to Plaintiff.

10. By its' conduct, Defendant has violated the Federal Fair Debt Collection Practices Act, 15 USC 1692, et al.

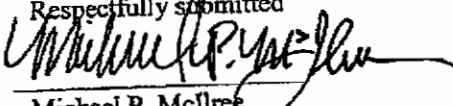
11. Defendant has violated 15 U.S.C. §1692c.

12. Defendant has violated 15 U.S.C. §1692d.

13. Defendant has violated 15 U.S.C. §1692f.

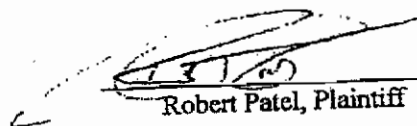
WHEREFORE, plaintiff requests that the Court enter judgment in his favor against the Defendant for:

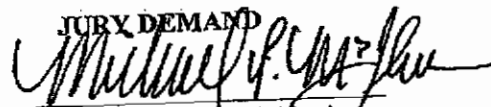
1. Mr. Patel's actual damages.
2. The maximum amount of statutory damages provided under the FDCPA.
3. Attorney's fees, litigation expenses and costs.
4. Such other and further relief as is appropriate.

Respectfully submitted
By 
Michael P. McIlree

VERIFICATION

I declare that the statements contained in the Complaint are true and accurate to the best of my knowledge and belief.


Robert Patel, Plaintiff

JURY DEMAND

Plaintiff demands trial by jury.

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